

Bayer CropScience



June 27, 2008

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Attention: Mr. Thomas Harris, Team 7, RD

Dear Mr. Harris,

Re: AERIS® Seed-Applied Insecticide/Nematicide - EPA Reg. No. 264-1057
Data Required under the Terms of the Conditional Registration
GLN Nos. 870.1200, 870.1300, 870.2400, 870.2500, 870.2600

Bayer CropScience
RTP
P. O. Box 12014
RTP, NC 27709
Tel. 919 549-2000

Please find enclosed a waiver request for the acute toxicity testing requirement for AERIS (EPA Reg. # 264-1057). Under the terms of the conditional registration of AERIS on July 9, 2007, EPA required the submission of data supporting data gaps for acute dermal toxicity (GLN 870.1200), acute inhalation toxicity (GLN 870.1300), primary eye irritation (GLN 870.2400), primary skin irritation (GLN 870.2500), and dermal sensitization (GLN 870.2600). Bayer CropScience believes that existing data are already available to assess the toxicity potential of AERIS. A detailed rationale is included in the attached waiver request.

Three (3) copies of the following documents are provided:

Volume 1 of 2: Transmittal Document

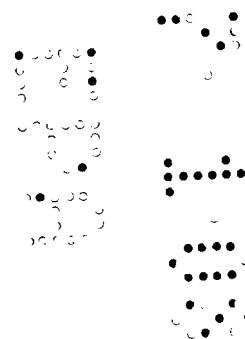
Volume 2 of 2: Sturdivant, D. (2008) Waiver Request for Acute Toxicity Testing Requirements for AERIS® Seed-Applied Insecticide/Nematicide (EPA Reg. No. 264-1057). EPA Guidelines OPPTS 870.1200, 870.1300, 870.2400, 870.2500, 870.2600. Bayer CropScience. Reference No. daL065-08. June 25, 2008. 8pp.

Please let me know if you need any additional information. You can reach me at (919) 549-2718 or by e-mail at Danielle.Larochelle@bayercropscience.com.

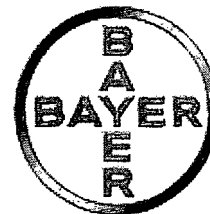
Sincerely,

Danielle A. Larochelle
Registration Product Manager

Corr. No. daL065-08



Bayer CropScience



VOLUME 1 of 2

TRANSMITTAL DOCUMENT

AERIS® Seed-Applied Insecticide/Nematicide
EPA Registration No. 264-1057

**Submission of a Waiver Request for Data Required Under
the Terms of the Conditional Registration Granted on July 9, 2007**

Bayer CropScience
RTP
P. O. Box 12014
RTP, NC 27709
Tel. 919 549-2000

Transmittal Date
June 27, 2008

Company Official:

Company Name:

Bayer CropScience

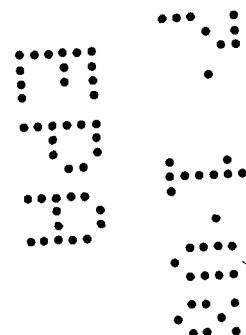
Company Contact:

Danielle A. Larochelle

Telephone:

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BIBLIOGRAPHY OF SUBMITTED REPORT

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